

SUPPRESSED

FILED

FEB 27 2020

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE R. ARNOWITZ,

Defendant.

4:20CR00135 SRC/SPM

INDICTMENT

THE GRAND JURY CHARGES:

COUNT 1
MAIL FRAUD

A. INTRODUCTION

At all times relevant to the Indictment:

1. Defendant **LAWRENCE R. ARNOWITZ** (hereinafter referred to as “**ARNOWITZ**”) was Alderman of the 12th Ward in the City of St. Louis, Missouri, having been first elected during 2011.

2. On or about January 18, 2011, defendant **ARNOWITZ** organized and registered with the Missouri Ethics Commission his campaign committee, “Committee to Elect Larry Arnowitz.” On or about September 2, 2011, following his initial election to the St. Louis Board of Aldermen, defendant **ARNOWITZ** changed the name of his campaign committee to “Friends of Larry Arnowitz,” formally amending the name with the Missouri Ethics Commission.

3. Defendant **ARNOWITZ** maintained a bank account for the “Friends of Larry Arnowitz” campaign committee at Midwest BankCentre in St. Louis, Missouri, account number XXXX8814. Defendant **ARNOWITZ** was an authorized signatory on that bank account, and

had complete access to the account and funds within that account. Defendant **ARNOWITZ** maintained a primary personal bank account at St. Louis Community Credit Union, account number XXXXXXXX0074. Defendant **ARNOWITZ** was an authorized signatory on that bank account, and had complete access to the account and funds within that account.

B. SCHEME TO DEFRAUD

4. Beginning on or about June 1, 2015 and continuing through on or about February 13, 2019, both dates being approximate and inclusive, in the Eastern District of Missouri and elsewhere, the defendant,

LAWRENCE R. ARNOWITZ,

devised, intended to devise, and knowingly participated in a scheme to defraud and to obtain money from donors to the “Friends of Larry Arnowitz” campaign committee by means of materially false and fraudulent pretenses, representations, and promises.

5. It was a part of the scheme that, on one and more occasions, defendant **ARNOWITZ** misled donors by falsely representing, and causing to be falsely represented, that money contributions to the “Friends of Larry Arnowitz” campaign committee would be used for campaign and reelection purposes, when, in fact, defendant **ARNOWITZ** used a portion of the money contributed by donors to the “Friends of Larry Arnowitz” campaign committee for his own personal use and expenses.

6. It was a further part of the scheme that after fraudulently convincing constituents to donate money to the “Friends of Larry Arnowitz” campaign committee, defendant **ARNOWITZ** knowingly used monies in the “Friends of Larry Arnowitz” campaign committee

bank account for his own benefit in various ways, including but not limited to: Using money in the account to pay for his personal home mortgage; withdrawing funds from the account through cash withdrawals; and, using money in the account to purchase items for his personal use. From time to time, **ARNOWITZ** made cash withdrawals from his “Friends of Larry Arnowitz” campaign committee bank account and deposited those cash funds in his personal bank account, using those funds to pay for personal living expenses unrelated to any legitimate campaign and reelection purpose.

7. It was a further part of the scheme that defendant **ARNOWITZ** acted to conceal his scheme by filing false reports with the Missouri Ethics Commission, which failed to identify one and more of his cash withdrawals from the “Friends of Larry Arnowitz” campaign committee bank account, and which failed to identify payments made directly from the “Friends of Larry Arnowitz” campaign committee bank account which were made for his own personal use, unrelated to any campaign or reelection purpose.

C. THE MAILING

COUNT ONE

8. On or about February 13, 2019, within the Eastern District of Missouri and elsewhere, for the purpose of executing the above-described scheme to defraud and to obtain money and property by means of false and fraudulent pretenses and representations, the defendant,

LAWRENCE R. ARNOWITZ,

knowingly mailed, or caused to be mailed, a cashier’s check in the amount of \$5,000.00, which funds had been withdrawn by defendant from the “Friends of Larry Arnowitz” campaign

committee bank account, from St. Louis, Missouri to OCWEN Financial Services, located in Dallas, Texas. The cashier's check was a payment on defendant's personal home mortgage loan, and unrelated to any legitimate campaign or reelection purpose.

All in violation of Title 18, United States Code, Section 1341.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

HAL GOLDSMITH, #32984MO
Assistant United States Attorney